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**From:** Kluesner, Dave [kluesner.dave@epa.gov]  
**Sent:** 3/26/2018 7:52:32 PM  
**To:** Lopez, Peter [lopez.peter@epa.gov]  
**CC:** Mears, Mary [Mears.Mary@epa.gov]; Lyon, Christopher [lyon.christopher@epa.gov]  
**Subject:** ONE EMAIL WITH THE THREE OUTSTANDING MEDIA INQUIRIES: Limetree Bay Asbestos + PBS NewsHour on AES + Battery Recycling Superfund site  
**Attachments:** Asbestos Notification-Hurricane Maria.pdf

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**STATUS:** Open

**INQUIRY RECEIVED ON:** March 16

**Deadline:** March 27

**PAD CONTACT:** Elias Rodriguez

**Reporter:** Brian O'Connor, USVI Daily News

**Questions / Proposed Responses from reporter:**

The Reporter received a tip that there was a cleanup at the St Croix Lime Tree Bay facility after the hurricanes. Is this regulated by EPA? Was EPA aware of these operations to address asbestos at the facility?

**Response:** The Limetree Bay Terminals facility is regulated by EPA under the National Emissions Standards for Hazardous Air Pollutants (NESHAP). Abatement of asbestos-containing material at the facility is managed by the facility, by workers trained and certified to perform asbestos abatement work.

EPA was informed by the facility that during the hurricanes, Limetree Bay sustained some damage to insulation of pipes and other process equipment. Although the damage was not a true "asbestos renovation or demolition" under NESHAP, since the amount of asbestos debris caused by Hurricane Maria was larger than the regulated amounts associated with NESHAP (greater than 160 linear feet), it was subject to the asbestos

NESHAP work practice requirements for handling and disposing of the debris properly. The requirements ensure that the debris is kept wet and bagged in a leak-tight bag, and disposed at an asbestos regulated landfill. Lime Tree Bay sent the asbestos-containing material to the mainland to be disposed of at landfills that accept such waste.

An EPA On Scene Coordinator did a post-hurricane assessment at the facility and did not observe the presence of any asbestos-containing material.

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- **First USVI article copied below. Note: Contrary to the statement in the article below, the reporter was told last Friday in a telephone conversation that the relevant EPA subject-matter experts were not in the office that day and that his same day deadline was not achievable.**
- **Notice to EPA attached.**

### **Limetree Bay warns workers about asbestos**

VI DAILY NEWS

BY BRIAN O'CONNOR Daily News Staff

Mar 19, 2018

Limetree Bay Terminals has warned its workers that officials don't know how far asbestos may have strayed in the wake of hurricanes Irma and Maria.

As Hurricane Maria battered St. Croix on Sept. 19 and 20, among the sites that suffered at least some damage was the former HOVENSA oil refinery, according to a company memo obtained by The Daily News.

The memo — written Oct. 9 by Vice President of Operations Nate Werner — says at least some of the damaged buildings likely contained asbestos.

The subject came up at a safety meeting, Werner wrote.

"During the weekly safety topic, we discussed damage to insulation in the idled refinery process units from the storm and potential hazards it might present," he wrote. "Limetree Bay is required to assume most of this insulation contains asbestos, but only testing will confirm that. Insulation is being kept damp while removal/disposal operations are underway. Access to areas where damaged insulation is present has been restricted and proper PPE is required."

According to the EPA, by keeping the materials wet it makes it more difficult for the material to become airborne and easier to cleanup.

PPE is a common abbreviation for Personal Protective Equipment.

The notification was taken both to meet Occupational Safety and Health Administration requirements, as well as out of an abundance of caution, Werner wrote.

"When asbestos removal and management operations are conducted at a site, OSHA regulations require a formal notification to employees and other employers at the site who are in or may be near the work areas of the presence, location and quantity of asbestos containing materials or potentially asbestos containing materials," Werner wrote. "To ensure everyone is aware of potential hazards, Limetree Bay has decided to notify all of our employees and other employers on site, even those who work in areas that are asbestos-free."

The memo was addressed to all employees and contractors working at the site.

Werner directed questions about the memo and the measures that have been taken to Limetree Bay Terminals spokeswoman Tara Graham, who did not respond to a call for comment Friday.

V.I. Planning and Natural Resources spokesman Jamal Nielsen said the department had not been notified of any release from the facility, though he pointed out that the site also contains an asbestos dump site. Enforcement at the site is usually conducted by the EPA, Nielsen said.

EPA officials did not return calls for comment Friday.

The refinery isn't the only source of asbestos on St. Croix. The former Alcoa plant, portions of which were visibly damaged by Maria, also has been the subject of asbestos warnings from the EPA in the past.

Asbestos is a mineral material used as insulation in construction in the past, capable of causing lung disease and cancer in people exposed to it.

According to the National Cancer Institute, low levels of asbestos exposure do not usually constitute a threat.

According to the institute, “people who become ill from asbestos usually have been exposed to it on a regular basis, most often in a job where they have worked directly with the material or through substantial environmental contact.” Education Department officials have said that asbestos was also discovered in three Virgin Islands schools in the wake of the 2017 hurricanes.

The presence of asbestos in the schools wasn’t enough to close any of the facilities, all of which are currently in use by students, V.I. Education Commissioner Sharon McCollum said.

— Contact Brian O’Connor at 340-714-9130 or email [boconnor@dailynews.vi](mailto:boconnor@dailynews.vi).

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